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8 UNITED STATES DISTRICT COURT

9 SOUTHERN DISTRICT OF CALIFORNIA

10 **(HONORABLE ROGER T. BENITEZ)**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 AGUSTIN RAMIREZ-URIBE,

15 Defendant.

) CASE NO. 08CR1187-BEN
)
)

) DATE: June 2, 2008

) TIME: 2:00 p.m.

) NOTICE OF MOTIONS AND MOTIONS
) TO:
)

) (1) PRESERVE EVIDENCE AND
) COMPEL PRODUCTION OF
) DISCOVERY; AND
) (2) GRANT LEAVE TO FILE
) FURTHER MOTIONS.
)

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19 TO: KAREN P. HEWITT, UNITED STATES ATTORNEY;
20 STEVEN DESALVO, ASSISTANT UNITED STATES ATTORNEY;

21 PLEASE TAKE NOTICE that on June 2, 2008 at 2:00 p.m., Agustin Ramirez-Uribe, by and
22 through his attorneys, Shaffy Moeel and Federal Defenders of San Diego, Inc., will ask this Court to enter
23 an order granting the following motions:

24 (1) compelling discovery and preservation of evidence; and

25 (2) granting leave to file further motions.

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These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

Dated: May 22, 2008

/s/ Shaffy Moeel
SHAFFY MOEEL
 Federal Defenders of San Diego, Inc.
 Attorneys for Mr. Ramirez